

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DOROTHY A. LANGFORD)	
)	
Plaintiff,)	
)	
vs.)	CASE NO. 2:06-cv-01025-WKW-CSC
)	
)	
McDONALD'S CORPORATION AND)	
BUDDY ROGERS)	
)	
Defendant.)	
_____)	

**CONSENT MOTION TO EXTEND TIME
IN WHICH TO FILE DISPOSITIVE MOTIONS**

COME NOW Defendant McDonald's Corporation ("McDonald's"), and Plaintiff Dorothy A. Langford ("Langford" or "Plaintiff"), and file this Consent Motion to Extend Time in Which to File Dispositive Motions, showing this Court as follows:

1. This Court entered its Uniform Scheduling Order on February 6, 2007.

2. On March 2, 2007, Plaintiff moved to amend her Complaint to add Buddy Rogers as a party-Defendant in this action.

3. On March 8, 2007, Plaintiff's Motion to Amend was granted, and Plaintiff's Amended Complaint adding Buddy Rogers as a party-Defendant was filed on March 12, 2007.

4. On April 30, 2007, Plaintiff again moved to amend her Complaint to add another party-Defendant, DBR, Inc; said Motion is still pending before this Court.

5. On June 29, 2007, Defendant Buddy Rogers ("Rogers") filed a Motion to Suspend Scheduling Order as to Defendant Rogers. The deadlines set forth in the Scheduling Order of February 6, 2007, were set prior to Plaintiff Langford joining Defendant Rogers in this case.

6. Currently dispositive motions in this case are set to be filed on August 2, 2007.

7. All parties having conferred and given consent, and in light of the need to conduct additional discovery should Plaintiff's second motion to amend her Complaint be granted by this Court, Defendant McDonald's and Plaintiff Langford respectfully request that this Court grant an extension of time for the filing of their dispositive motions through and including September 4, 2007.

WHEREFORE, Defendant McDonald's Corporation and Plaintiff Dorothy A. Langford respectfully request that this Court extend the time in which the parties shall be required to file their dispositive motions in this case through and including September 4, 2007.

This 11th day of July, 2007.

Respectfully submitted,

s/ Jack L. McLean, Jr.
Jack L. McLean, Jr.
Georgia Bar No. 496855
Admitted Pro Hac Vice

OF COUNSEL:

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One of the Attorneys for
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s/ Jackson B. Harrison
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Attorney for Plaintiff
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s/ Sally B. Waudby
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Buddy Rogers

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day electronically filed this **CONSENT MOTION TO EXTEND TIME IN WHICH TO FILE DISPOSITIVE MOTIONS** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorney of record:

Jackson B. Harrison
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Sally B. Waudby
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This 11th of July, 2007.

s/ Jack L. McLean, Jr.
Jack L. McLean, Jr.
Georgia Bar No. 496855
Admitted Pro Hac Vice

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ORDER

THIS COURT, having reviewed all the information contained in the foregoing *Consent Motion to Extend Time in Which to File Dispositive Motions*, hereby **GRANTS** the parties' Motion and **ORDERS** an extension of time through and including September 4, 2007, in which Defendant McDonald's Corporation and Plaintiff Dorothy A. Langford shall be required to file their respective dispositive motions with this Court.

SO ORDERED.

This _____ day of July, 2007.

HONORABLE W. KEITH WATKINS
DISTRICT COURT JUDGE